

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

IN RE: BARD IVC Filters Product Liability Litigation)	MDL No. 2:15-md-02641-PHX-DGC
)	
)	
)	
)	
This Document Relates to the cases listed on Exhibit attached hereto.)	STIPULATION OF DISMISSAL WITHOUT PREJUDICE
)	
2:18-cv-02306-DGC)	
2:19-cv-03864-DGC)	
2:19-cv-04079-DGC)	
2:19-cv-02322-DGC)	

TO THE HONORABLE JUDGE OF SAID COURT:

COME NOW, Plaintiffs whose case are listed on Exhibit A attached hereto (“Plaintiffs”) and Defendants C.R. Bard, Inc. and Bard Peripheral Vascular, Inc. (“Defendants”), and file this Stipulation of Dismissal without Prejudice, and in support thereof, respectfully show the Court as follows:

Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), Plaintiffs and Defendants hereby stipulate to the dismissal of the cases listed on Exhibit A without prejudice to the re-filing of same. Plaintiffs and Defendants further stipulate that they are to bear their own costs.

WHEREFORE, PREMISES CONSIDERED, Plaintiffs and Defendant hereby respectfully request that the Court dismiss the cases listed on Exhibit A in their entirety without prejudice to the re-filing of same and order that these parties are to bear their own costs.

Respectfully Submitted,

/s/ MATTHEW R. MCCARLEY

Matthew R. McCarley

Texas Bar No. 24041426

mccarley@fnlawfirm.com

FEARS NACHAWATI, PLLC

5473 Blair Rd.

Dallas, Texas 75231

Tel. (214) 890-0711

Fax (214) 890-0712

ATTORNEYS FOR THE PLAINTIFF

Dated: January 16, 2020

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on January 16, 2020, the foregoing pleading was filed electronically with the Clerk of the Court using the CM/ECF system. Notice of this filing will be sent to Liaison Counsel for Plaintiffs and Defendants by operation of the Court's electronic filing system and served on all other plaintiff counsel via MDL Centrality, which will send notice of electronic filing in accordance with the procedures established in MDL 2592 pursuant to Pre-Trial Order No. 17.

/s/ **MATTHEW R. MCCARLEY**
Matthew R. McCarley

EXHIBIT "A"

Member Case Number	Full Name of Plaintiff	Date Answer Filed (If applicable)
2:18-cv-02306-DGC	Vivian Esther George	8/29/2018
2:19-cv-03864-DGC	Tarvey Ward	8/2/2019
2:19-cv-04079-DGC	Scott Stafford	8/2/2019
2:19-cv-02322-DGC	Christopher Hartney	4/17/2019